

*REMARKS*

The amendments set out above and the following remarks are believed responsive to the points raised by the Office Action dated July 3, 2003. In view of the amendments set out above and the following remarks, reconsideration is respectfully requested.

*The Pending Claims*

Dependent claims 5, 8, 15, and 18 have been canceled and rewritten as independent claims 21-24, respectively. Claims 1 and 11 have been amended to describe the invention more clearly. The dependencies of claims 6 and 16 have been corrected to provide the required antecedent basis. No new matter has been added. The basis for the amended claim language may be found within the original specification, claims, and drawings.

*Allowable Subject Matter*

Applicants are pleased to note that claims 5, 8, 15, and 18 are indicated to be allowable if rewritten in independent form including the limitations of the respective base claims and any intervening claims, and claims 6, 7, 16, and 17 would also be allowable, if the rejection under Section 112, second paragraph was overcome.

*The Office Action*

The specification has been amended to capitalize the trademark STYROFOAM®.

Claims 6, 7, 16, and 17 were rejected under 35 USC 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Claims 6 and 16 have been amended to provide antecedent basis. Thus, it is respectfully submitted that with these amendments to the claims, the bases for rejection under 35 USC 112 has now been overcome and should be withdrawn.

Claim 1 was rejected under 35 U.S.C. §102 as anticipated by U.S. Patent No. 4,478,331 to Ruin. Claims 1-4, 8-14, and 18-20 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,950,836 to Iwamoto et al. (hereinafter referred to as "Iwamoto"). Claims 10 and 20 were rejected under 35 U.S.C. §103(a) as being unpatentable over Iwamoto in view of Ruin. Each of these rejections is respectfully traversed.

Amended independent claim 1 defines a plasma display panel (PDP) module packing apparatus comprising, inter alia, a plurality of PDP module packing units including a support member and a coupling unit including a fastener passing through the support member and threadedly engaging the PDP module, and a plurality of shock absorbing units. Amended

independent claim 11 defines a packaged PDP module assembly including, inter alia, a plurality of PDP module packing units, each unit including a support member and a coupling unit including a fastener passing through the support member and threadedly engaging the PDP module.

None of the cited references discloses or suggests the claimed invention. For example, Ruin fails to disclose or suggest a PDP module packing apparatus or assembly including a coupling unit including a fastener passing through the support member and threadedly engaging the PDP module. A reference anticipates a claimed invention only if it discloses each and every element of the claimed invention. Accordingly, Ruin cannot anticipate claim 1, since Ruin does not disclose a coupling unit including a fastener passing through the support member and threadedly engaging the PDP module.

Ruin, in contrast with the present invention, discloses a container for transporting *printed circuit boards*, and does not even suggest transporting PDP modules. Transporting printed circuit boards is completely different from transporting PDP modules, since printed circuit boards are so much lighter than PDP modules and thus do not present the challenges present in packing PDP modules for transport. The container of Ruin comprises plates having guide tracks and sliders for retaining a printed-circuit board. The circuit board is received *with a frictional fit*, in a lateral recess of a clip which comprises part of the slider (see e.g., col. 2, lines 55-63 and Figure 3). There is simply no suggestion or motivation in Ruin to modify the container to include a fastener passing through the support and threadedly engaging the printed circuit board.

Iwamoto also fails to disclose or suggest the presently claimed invention. For example, Iwamoto does not disclose coupling units to fasten the transported good to the support, let alone coupling units including a fastener passing through the support member and threadedly engaging the good. Applicants respectfully point out that there is no basis for asserting that the holes shown in Figure 2 of Iwamoto are for the purpose of coupling the transported good to the support member. As the Office Action admits, Iwamoto does not specifically mention coupling units, at all. There is simply no motivation to provide coupling units in Iwamoto. Rather it appears it appears the rejection is based on improper hindsight based on Applicants' disclosure.

For the reasons set forth above, reconsideration of the rejections is respectfully requested.

In view of the amendment and remarks recited herein, the application is considered in good and proper form for allowance, and the Examiner is respectfully requested to pass this application to issue.

In re Appln. of KIM et al.  
Application No. 10/054,920

If, in the opinion of the Examiner, a telephone conference would expedite the prosecution of the subject application, the Examiner is invited to call the undersigned attorney.

Respectfully submitted,

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